

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES, *et al.*

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

No: 1:23-cv-00108-LMB-JFA

**[PROPOSED] ORDER GRANTING THE PARTIES' MOTIONS TO SEAL (DOCKET
NOS. 605, 642, 661, 667, AND 712)**

Pursuant to Local Civil Rule 5(C), the Parties filed motions to seal, seeking leave to file certain sealed and redacted versions of memoranda and exhibits submitted to the Court in connection with summary judgment and *Daubert* briefing. Non-party Equativ SAS (“Equativ”) filed a Memorandum in Support of the Parties’ Motions to Seal (the “Equativ Memorandum”) as required by Local Civil Rule 5(C).

Upon consideration of the Parties’ motions, supporting papers, the Equativ Memorandum, and the declaration of Arnaud Creput in support thereof, the Court finds that (i) the exhibits and redacted text contain Equativ’s confidential business information; (ii) only sealing will sufficiently protect Equativ from competitive harm, and no less drastic alternatives will suffice; (iii) the limited sealing and redaction properly balances Equativ’s interests against the public’s interest; and (iv) the public’s right of access, whether based on the common law right of access, or the First Amendment right of access, has been overcome. Accordingly, for good cause shown, it is hereby:

ORDERED that Defendant Google LLC’s Motion to Seal (Dkt No. 605) and Plaintiffs’ Motions to Seal (Dkt. Nos. 642, 661, 667, and 712) are GRANTED as to Equativ’s highly

confidential information as outlined in Appendix A to the Equativ Memorandum. The exhibits and redacted text shall remain under seal until further order of the Court.

ENTERED this ____ day of _____ 2024.
